

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

MARY QUESENBERRY, PAUL E.  
HOLLANDSWORTH, WALTER E. VIERS,  
CURTIS L. COX, ROBERT K. GOAD,  
SHIRLEY I. TOLBERT, on behalf of  
themselves and all other persons similarly  
situated; INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE, AND  
AGRICULTURAL IMPLEMENT WORKERS  
OF AMERICA and UAW LOCAL UNION  
2069

Plaintiffs,

v.

VOLVO GROUP NORTH AMERICA, INC.  
f/k/a VOLVO TRUCKS NORTH AMERICA,  
INC. and VOLVO TRUCKS NORTH  
AMERICA RETIREE HEALTHCARE  
BENEFIT PLAN

Defendants.

Judge James P. Jones  
Magistrate Judge Pamela Meade Sargent

Civil Action No. 1:09-cv-00022

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES**

As the prevailing parties in this action, and for the reasons set forth in their  
Memorandum in Support of Plaintiffs' Motion for Attorneys' Fees and Expenses,  
Plaintiffs Mary Quesenberry, Paul Hollandsworth, Walter Viers, Curtis Cox, Robert  
Goad, and Shirley Tolbert (collectively, "Named Plaintiffs"); International Union, United  
Automobile, Aerospace and Agricultural Implement Workers of America ("UAW"); and  
UAW Local 2069, respectfully request that the Court exercise its discretion under section  
502(g) of the Employee Retirement Income Security Act of 1974 ("ERISA"), 29 U.S.C.

§ 1132(g)(1), and award them attorneys' fees and expenses in the amount of \$1,047,601.42.

Respectfully submitted,

*s/ Julia Penny Clark*

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*Counsel for Plaintiffs*

May 3, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2010, I electronically filed the foregoing Plaintiffs' Motion for Attorneys' Fees and Expenses with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Respectfully submitted,

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